

Driving Standards Agency

A Hampton Implementation Review Report

March 2010

Driving Standards Agency

This review is one of a series of reviews of regulatory bodies focused on the assessment of regulatory performance against the Hampton principles and Macrory characteristics of effective inspection and enforcement. It was carried out by a Review Team drawn from the Better Regulation Executive, Health and Safety Executive and Animals (Scientific Procedures) Inspectorate in October 2009.

Further information about the reviews can be found at:

<http://bis.gov.uk/policies/better-regulation/improving-regulatory-delivery/implementing-principles-of-better-regulation/reviewing-regulators>

EXECUTIVE SUMMARY AND CONCLUSIONS

Key findings from the review:

There is some encouraging evidence that the Driving Standards Agency (DSA) is seeking to embrace the Hampton vision with planned reforms that will strengthen its regulatory performance. However, more will need to be done to ensure that the DSA is Hampton compliant across all its regulatory functions.

The key findings of the Review were that:

- The DSA demonstrated a strong awareness of the policy development process and a willingness to engage in the development of both primary and secondary legislation. The Review Team were impressed by the DSA's engagement with the recent developments in European regulation;
- The DSA's ongoing work to reduce the administrative burdens faced by business, in particular through data sharing with other organisations such as the Driver and Vehicle Licensing Authority (DVLA), is impressive and a good example of Hampton principles being applied effectively by a regulator;
- The DSA has a strong understanding of the needs of its stakeholders and its customer focused approach helps it to respond to these. The DSA strives to put the needs of businesses first and this is particularly evident in its approach to inspecting Approved Driving Instructors (ADIs). However, the Review Team was concerned that the DSA's business focused approach to inspection, particularly when check testing ADIs, could undermine its ability to uncover cases of regulatory non-compliance;
- The DSA is making a concerted effort to identify and sanction rogue traders who offer driving instruction without being registered and has set up a specific team to implement this policy; and
- The DSA could be more transparent and in particular provide businesses with clarity regarding the way in which it will apply and determine administrative penalties.

<p>Issues for follow-up identified during the review:</p>	<p>The key issues for follow-up identified by the Review are that:</p> <ul style="list-style-type: none"> • The DSA’s current inspection regime should be reformed so as to align it with the Hampton principles. In particular, the DSA should move away from routine inspection and towards an approach that is firmly based on risk assessment and allows it to focus its resources on those businesses where the likelihood of non-compliance is the greatest. The DSA is already in the early stages of considering reforms to its licensing and inspection regimes, and the Review Team would encourage the DSA to take this opportunity to consider a new approach to inspection; • The DSA should draw up and publish an enforcement plan covering its role in relation to unlicensed driving instructors and the registration and deregistration of ADIs. The Review Team believes that this would be a significant step towards making the DSA more Hampton compliant and would help to provide clarity regarding the DSA’s approach to applying administrative penalties; • The DSA is taking a number of steps to ensure more effective communication with its stakeholders. The Review Team encourages it to take advantage of the high level of access it has to its stakeholders to further ensure effective communication; and • More needs to be done to ensure that all interested parties have the opportunity to participate in formal and informal consultations. The Review Team would recommend that the DSA consider ceasing its use of an internally approved and limited list of consultees.
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INTRODUCTION

Introductory background information about the regulator such as the rationale for establishing it:

The DSA was established as an executive agency in April 1990. Before this the government department responsible for transport administered driving tests and regulated driving instructors.

The DSA defines its vision as *Safe Driving for Life*, which incorporates comprehensive driver training with lifelong driver development after licence acquisition.

The DSA's responsibilities include:

- Promoting road safety by influencing driver and rider behaviour and setting standards for drivers and driver trainers;
- Conducting effective and efficient computer-based and practical test assessments;
- Delivering driver education; and
- Registering and regulating ADIs.

The DSA forms part of the Motoring and Freight Services Group alongside the Driver and Vehicles Licensing Agency (DVLA), the Vehicle Certification Agency (VCA) and the Vehicle and Operating Services Agency (VOSA) amongst others. The Motoring and Freight Services Group's overall objective is to ensure that qualified drivers in roadworthy vehicles use roads.

The regulator's statutory remit or objectives:

The DSA is responsible for operating and managing a register of ADIs under the Road Traffic Act 1988 and responding to appeals made against the Registrars decisions under the Transport Tribunal Rules 2000.

The DSA's core business also includes:

- Administering the theory and practical tests for learner drivers (under Part III of the Road Traffic Act 1988 and the Motor Vehicles (Driving Licenses) Regulations 1999);
- Authorising training bodies and instructors for approved training courses for learner motorcyclists (under Part V of the Motor Vehicles (Driving Licenses) Regulation 1999);
- Initial qualification and periodic training of lorry and bus drivers (under the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007);

	<p>and</p> <ul style="list-style-type: none"> • Detecting fraud in relation to the above (under Parts III, IV and V of the Road Traffic Act 1988 and the Fraud Act 2006). <p>In addition to its statutory functions, the DSA administers the voluntary register of large goods vehicle (LGV) instructors, which aims to raise the standards of training for lorry drivers and reduce accidents involving LGVs, and a voluntary register for fleet driver trainers which sets standards for those offering fleet driver training.</p>
The regulator's budget:	The DSA's annual income is approximately £190 million. The DSA operates as a trading fund and is funded through fees and revenue raised from road safety initiatives.
Number of staff:	The DSA currently employs approximately 2650 members of staff, including managers, administrative staff and examiners.
The sectors and number of businesses regulated either directly or indirectly:	The DSA has a relatively narrow statutory remit and its regulatory activity is mainly directed at ADIs. There are currently 44,768 registered ADIs in the UK.

THE HAMPTON VISION

“Both the Hampton and Macrory reports are concerned with effective regulation – achieving regulatory outcomes in a way that minimises the burdens imposed on business. Key to this is the notion that regulators should be risk-based and proportionate in their decision-making, transparent and accountable for their actions and should recognise their role in encouraging economic progress.”

<p>Any findings relevant to whether the regulator is risk-based:</p>	<p>The Review Team felt that the DSA was not risk-based in its approach to regulation. This was reflected in its approach to inspection.</p> <p>The DSA’s inspection regime is built upon routine check testing of ADIs. The Road Traffic Act 1988 states that all ADIs must undergo a test of their “continued ability and fitness to give instruction” as a condition of registration. This test is to be undertaken when required by the Registrar, i.e. the DSA. The check test has been designed by the DSA to fulfil this statutory obligation.</p> <p>The DSA aims to tests all ADIs approximately once every four years. ADIs are graded on a scale of 1-6, 1 being dangerous, 2 to 3 substandard, 4 competent, 5 good and 6 very good. ADIs that are considered to be competent, substandard or dangerous are tested more frequently.</p> <p>While it is clear that the DSA takes a lighter touch approach to the highest performing ADIs, this does not appear to be based on an effective assessment of risk.</p>
<p>Any findings relevant to whether the regulator is transparent and accountable:</p>	<p>The Review Team felt that the DSA could do more to make sure that its regulatory activity is transparent. In particular, the DSA could publish an enforcement plan covering their role in relation to unlicensed driving instructors and the registration and deregistration of ADIs.</p>
<p>Any findings relevant to whether the regulator encourages economic progress:</p>	<p>The DSA has a strong customer focus and strives to put the needs of business first when carrying out its regulatory functions. For example, inspections are arranged so as to impose the minimum burden on ADIs.</p>

DESIGN OF REGULATIONS

Hampton Principles

“All regulations should be written so that they are easily understood, easily implemented, and easily enforced, and all parties should be consulted when they are being drafted”

“When new policies are being developed, explicit consideration should be given to how they can be enforced using existing systems and data to minimise the administrative burden imposed.”

Key findings on Design of Regulations:

The legislative framework within which the DSA operates has not changed dramatically in recent years. Those legislative changes that have taken place have resulted from new European regulations. The DSA takes a proactive approach to engaging with the development of European regulations, working in partnership with sister agencies from other European countries to shape new regulations and ensure that they are proportionate and can be implemented at limited cost to business.

The DSA’s approach to formal consultation is impressive. It not only complies with the core principles of the Code of Practice on Consultation, but will go above and beyond these in its attempts to ensure that consultations are effective. In particular, the DSA seeks to ensure that its consultations are accessible to all its target audiences, publishing separate consultations where necessary.

While the DSA’s approach to formal consultation should be commended, there is evidence to suggest that more could be done to ensure that informal consultation is open to all interested parties. In addition, the DSA could do more to ensure that the results of consultations and policy changes are effectively and accurately communicated to stakeholders.

Background information such as the regulator’s role in developing regulations:

Ultimate responsibility for the design of regulations relating to driving standards and instruction lies with the Department for Transport (DfT) legal directorate. Where new regulations are developed in the UK, the DSA has to influence the design by working with the DfT to achieve a risk-based and proportionate approach that focuses on regulatory outcomes.

Where new regulations are developed in Europe, the DSA again has to work in partnership with the DfT to influence their design. In addition, the DSA often works alongside other European agencies responsible for driving standards

	<p>and instruction to ensure that new European regulations comply with the principles of better regulation and can be implemented at limited cost to business.</p>
<p>Example(s) of good practice:</p>	<p>The DSA sees early engagement as the key tactic in influencing the European policy development process and ensuring that new regulations are well designed and will achieve their stated outcomes at limited cost to business. In addition, the DSA works closely with sister agencies from across Europe so as to maximise its influence. This approach to influencing the development of European regulations should be noted as an example of good practice.</p> <p>The DSA's approach to making formal consultations accessible to all stakeholders should also be noted as an example of good practice. During the Learning to Drive consultation, for example, the DSA made particular efforts to ensure that teenagers could engage with the consultation, by using approaches including:</p> <ul style="list-style-type: none"> - Publishing a version of the consultation paper that was specifically designed for teenagers; - Setting up a micro-site for teenagers; and - Hosting a series of forums on the consultation.
<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principles:</p>	<p>The DSA complies with many of the principles of good consultation. Public consultations last 12 weeks or more and particular effort is made to ensure that consultations are accessible to all stakeholders. All of the DSA's consultations are available online and in hard copy and the Agency's business customer conferences are used to promote and receive feedback during consultations. The Learning to Drive consultation, for example, was made available online and in hard copy, as well as in a version designed specifically for teenagers. The DSA also ran 13 regional events and used its business customer conferences to promote and receive feedback on the consultation.</p> <p>While the DSA's approach to formal consultation is impressive, some ADIs noted that informal consultation was unnecessarily restricted. In particular, attention was drawn to the use of an approved list of consultees, which, it was suggested, excluded some stakeholders from early discussions regarding policy changes.</p> <p>There was some evidence that the results of consultations and policy changes were not effectively communicated to</p>

	<p>stakeholders. For example, a number of ADIs noted that the Learning to Drive Consultation had led to confusion regarding possible changes to the rules requiring ADIs to be present at a driving test. This had led some ADIs to invest in new vehicles unnecessarily.</p> <p>The DSA has a good internal communications network that allows it to stay in close touch with the views of business. The DSA is also in a unique position in that it has almost daily contact with its business stakeholders when ADIs visit test centres. The DSA takes advantage of this to ensure that the views of stakeholders are heard. For example, quarterly meetings allow DSA centres to feed back the views of ADIs to policy officials. This enables the DSA to monitor the response of ADIs to regulatory and policy changes.</p>
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ADVICE AND GUIDANCE	
<i>Hampton principle</i>	
<i>“Regulators should provide authoritative, accessible advice easily and cheaply”</i>	
Key findings on Advice and Guidance:	<p>The DSA’s approach to issuing guidance is not comprehensive. It has no guidance policy or strategy and does not publish guidance in response to all policy or legislative changes.</p> <p>The DSA could do more to ensure that, where it has developed guidance or advice in relation to policy changes, all ADIs are made aware of this.</p> <p>Some stakeholders complimented the DSA on the quality of its guidance, drawing attention, in particular, to the guidance on the introduction of the Hazard Perception Test and the Fit and Proper Person test.</p>
Background information such as the means by which the regulator provides advice and guidance:	<p>The DSA provides guidance online and in hard copy and makes use of external websites, such as Direct Gov and Business Link to disseminate its advice.</p> <p>The DSA also produces free publications for ADIs, including <i>Despatch</i>, which is sent to all ADIs and includes information on DSA initiatives, consultations and policy changes.</p> <p>After an inspection, the DSA provides verbal and written advice to under-performing ADIs.</p>
Example(s) of good practice:	
Review findings: The extent to which the review team believes the regulator is acting in line with the Hampton principle:	<p>The DSA has no specific guidance strategy. Instead, guidance is produced and updated as when the DSA believes it is necessary. There is some evidence of the DSA responding to the needs of business and providing guidance where it is required. For example, the DSA responded to the high number of errors made on CRB forms by producing additional guidance for ADIs. However, this <i>ad hoc</i> approach to publishing guidance means that some policy and legislative changes will not be accompanied by guidance.</p> <p>The DSA relies heavily on <i>Despatch</i> to communicate policy changes and provide advice in relation to these. DSA officials accepted that this approach means that</p>

	<p>some ADIs will not be informed of policy changes and will not have access to the advice associated with this. The Review Team felt that the DSA could do more to use its testing centres as a means of ensuring that ADIs receive relevant advice and guidance.</p> <p>The DSA has a long established policy of giving advice to ADIs as part of its inspection regime. This is used as a means of encouraging compliance and avoiding the use of formal sanctions.</p>
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DATA REQUESTS	
<i>Hampton principle</i>	
<i>“Businesses should not have to give unnecessary information or give the same piece of information twice.”</i>	
Key findings on Data Requests:	<p>The DSA proactively seeks to minimise the number of data requests that it makes, particularly through data sharing with other bodies such as the DVLA.</p> <p>While the DSA has no specific policy of reviewing data requests so as to ensure that they are still necessary and as light touch as possible, there is evidence that this is done on a regular, if ad hoc, basis. The DSA, in the main, reviews all the forms it uses to gather data once a year, or when policy changes necessitate a review.</p>
Background information such as the data required by the regulator; the means by which business can return data, etc:	<p>The DSA issues six forms in relation to the process of becoming and remaining an ADI:</p> <ul style="list-style-type: none"> - Application for registration as a potential driving instructor; - Application for a trainee licence (licence to give instruction); - The Instructor Training Declaration; - Application for registration as an ADI; and - Application for re-registration as an ADI. <p>All these forms can be filled in online.</p> <p>The DSA also requires all potential driving instructors to provide it with the details of their driving licences and to undergo a Criminal Records Bureau (CRB) check.</p>
Example(s) of good practice:	<p>The DSA has developed a close working relationship with the DVLA and is using this as a basis to share data where possible and minimise the number of data requests it makes of ADIs.</p>
Review findings: The extent to which the review team believes the	<p>The DSA's approach to data requests is impressive. It makes comparatively few data requests and continues to seek ways of reducing these wherever possible.</p> <p>The DSA works closely with the DVLA to share data. In particular, rather than asking prospective ADIs for</p>

<p>regulator is acting in line with the Hampton principle:</p>	<p>information relating to their driving licences the DSA retrieves this directly from the DVLA. The DSA is also investigating the possibility of directly accessing photo identification held by the DVLA, which would allow it to cease making requests for new photo ID from ADIs. The Review Team would encourage the DSA to continue pursuing data sharing options so as to further reduce the burdens placed on ADIs.</p> <p>The DSA regularly reviews and updates the forms it uses to gather data and provides guidance to businesses regarding the completion of forms. For example, the DSA responded to the high error rate in CRB forms completed by ADIs by providing additional advice and guidance on how to complete them. This has helped to ensure that ADI clearance is not delayed.</p> <p>Overall, the Review Team was impressed by the extent to which the DSA was acting in line with the Hampton principle on data requests.</p>
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INSPECTIONS	
<i>Hampton principle</i>	
<i>"No inspection should take place without a reason."</i>	
Key findings on Inspections:	<p>While the frequency with which an ADI is inspected ('check tested') is based on the score they achieved at their previous test, all ADIs are inspected as a matter of routine and the DSA does not apply a risk based approach to this.</p> <p>The DSA strives to ensure that check testing does not inconvenience ADIs or impose unnecessary costs on their business. In particular, the DSA will only carry out a check test at a time that is convenient for the ADI concerned. However, as a consequence of this business-focused approach, there is scope for an ADI to 'stage manage' a check test. Some ADIs and examiners indicated to the Review Team that it was not unheard of for an ADI to try to secure a high score at a check test by ensuring that it was carried out when they were teaching a star pupil.</p> <p>The DSA is in the process of reviewing its inspection regime and has been in discussions with the industry regarding this.</p>
Any relevant background information such as the number of inspections and the number of businesses inspected; the regulator's risk model etc	<p>The DSA is under a statutory obligation to periodically test an ADI's ability and fitness to give instruction to learner drivers. This obligation is met through check tests which are, in effect, a form of inspection.</p> <p>All ADIs undergo a check test at least once every four years and are graded on their performance. There is no statutory basis for the four-year cycle of check tests, although it does align with the four-year registration period.</p> <p>ADIs with grades 5 or 6 (good or very good) are tested again within four years (comprising around 38% of ADIs). Those graded 4 (competent) are tested again within two years (52% of ADIs). Those graded 3 or 2 (substandard) are given two further attempts to reach grade 4 before being removed from the register. Those graded 1 (dangerous) are given one further attempt to reach grade 4 before being removed from the register.</p> <p>The check test consists of a DSA examiner accompanying an ADI on a standard driving lesson (if this is not possible, the examiner will play the part of a student unless it is a final test). During the lesson, the examiner checks that</p>

	<p>knowledge is conveyed effectively and that driving faults do not go uncorrected.</p> <p>The DSA conducted 13,654 check tests in 2008/2009. This marked a decline from previous years (17,444 tests were conducted in 2006/2007 and 14,004 in 2007/2008).</p>
<p>Example(s) of good practice:</p>	<p>The DSA provides verbal feedback after every check test and complements this with written feedback for those ADIs most in need of improving their performance (those graded 3, 2 and 1).</p>
<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principle:</p>	<p>The DSA's approach to check testing is not truly risk-based. While the frequency with which an ADI undergoes a check test is based on previous performance, this does not inform the check test itself. The DSA makes no use of compliance records when carrying out a check test. In addition, the DSA, as a matter of policy, does not share with examiners an ADI's previous check test scores.</p> <p>While ADIs appeared to be broadly aware of the DSA's grading system, some suggested that the system's operation lacked transparency. In particular, some ADIs felt that it was unclear what was needed to score 6 at a check test as opposed to 5. It was suggested that this was particularly problematic, as some local authorities required ADIs to have scored 6 at a check test if they were to be recommended by the authority as an instructor for taxi drivers.</p> <p>Some ADIs also alleged that the check test system could be manipulated. In particular, it was suggested that an ADI could improve their chances of securing a high mark at a check test by ensuring that they were tested when teaching a particularly strong student. This is partly the result of the DSA's approach to arranging check tests, which places a strong emphasis on ensuring that tests are carried out at a time that suits an ADI. While this may allow some ADIs the opportunity to manipulate the system of check tests, the Review Team noted that the DSA's business-focused approach to check testing allowed it to minimise the burdens it imposed on ADIs through inspection.</p> <p>The Review Team noted that the failure rate at check tests is extremely low. Only 10% of ADIs check tested are re-tested, while only 359 ADIs are deregistered in 2008/2009. This suggests that there are very few substandard or dangerous driving instructors or that the inspection regime is failing to identify those ADIs that fall into this category. This means that neither ADIs nor consumers are benefiting from a regime that is designed to maintain standards within</p>

	<p>the industry, ensure consumer confidence and protect consumers and the public in general.</p> <p>The DSA's approach to feedback complies with the Hampton principles. The DSA provides all ADIs with verbal feedback after a check test and follows this up with written feedback for ADIs scoring between 1 and 3. Some ADIs stated that they found the check test beneficial for this reason.</p> <p>The DSA accepts that there are limitations to the check test system and is currently in the process of reviewing this. The Review Team felt that there is scope to introduce a more effective risk-based system that would align better with the Hampton principles and would help to raise the standards of ADIs.</p>
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SANCTIONS

Hampton & Macrory principles

“The few businesses that persistently break regulations should be identified quickly, and face proportionate and meaningful sanctions.”

“Regulators should be transparent in the way in which they apply and determine administrative penalties.”

“Regulators should avoid perverse incentives that might influence the choice of sanctioning response.”

“Regulators should follow up enforcement actions where appropriate.”

Key findings on Sanctions:

The DSA is focusing increasing efforts on identifying individuals who fraudulently take payment for driving instruction. While the DSA has no sanctioning powers in relation to this activity, where it has developed a close working relationship with the police and the Crown Prosecution Service it has had notable successes in prosecuting unlicensed driving instructors.

Some ADIs noted that the sanctions available in relation to unlicensed ADIs were not robust enough to act as an effective deterrent. In addition, there appears to be a sense within the industry that the number of unlicensed ADIs is growing.

The DSA has a published Fraud Response Plan, which sets out its procedures for dealing with the frauds that fall within its remit. However, the DSA does not have an enforcement plan or any public policy regarding the approach it takes to applying administrative sanctions to ADIs.

Background information such as a summary of sanctions available to the regulator and any data on sanctions imposed by the regulator:

The DSA’s sanctioning powers in relation to ADIs are limited to removal from the approved list of instructors. Such action is based on an ADI’s score at a check test. Repeated failure to score 4 on a check test will result in an ADI’s removal from the register. The registrar can also, at his or her own discretion, remove an ADI from the register after one unsatisfactory score at a check test. The DSA removes, on average, 2,700 ADIs from the register every year. The Registrar instigates around half of these, while the rest result from requests from ADIs.

The DSA also undertakes a significant amount of work identifying individuals who offer driving instruction without registering as an ADI. The DSA employs dedicated

	<p>investigators within its Fraud and Integrity Team to deal specifically with these cases. However, while the DSA can investigate cases of fraudulent instruction, they have no power to apply any sanctions.</p> <p>There are widely divergent estimates of the number of 'illegal' driving instructors operating in the UK. At one end it was claimed that "every ADI knew at least one illegal instructor" and at the other end it was reported as being "heard of, but very little actually seen".</p> <p>The DSA have a number of business targets in relation to enforcement. The key targets for 2009/2010 are:</p> <ul style="list-style-type: none"> - To progress to conclusion 150 investigations in relation to allegations of illegal driving instruction; - To conduct 24 roadside enforcement checks for illegal instruction; - To investigate 300 allegations of illegal driving instruction.
<p>Example(s) of good practice:</p>	<p>Intelligence-led initiatives have been used occasionally to good effect; one example was given which saw 18 Instructors' cars being stopped, of which 3 were operating illegally.</p>
<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principles and Macrory characteristics:</p>	<p>The DSA understands the need to quickly identify those businesses that persistently break regulations. The DSA has established a dedicated team to investigate cases of fraudulent instruction in response to an increasing number of complaints regarding this. As the DSA has no sanction powers in relation to fraudulent instruction, it works in collaboration with the police and the CPS to bring cases to court. While there are examples of the DSA successfully prosecuting unlicensed driving instructors, its ability to do so is limited. The Review Team believes that the DSA could investigate the ways in which further co-operation with the police or other public bodies could help to ensure that more unlicensed driving instructors are prosecuted.</p> <p>The DSA's approach to sanctioning ADIs complies with the Hampton principles in a number of ways. In particular, the DSA always provides ADIs with the opportunity to improve their grade at a check test and ensure compliance before applying a sanction. In addition, the DSA encourages compliance through advice and guidance.</p> <p>By limiting the number of opportunities available to dangerous and substandard ADIs to ensure registration,</p>

the DSA seeks to apply a proportionate approach to enforcement in spite of the limited range of sanctions available to it. However, by making greater use of the information available to it and maintaining and utilising compliance records, the DSA would enhance its ability to identify those ADIs who regularly fail to meet the required standards of instruction. This would complement a more risk-based approach to instruction and would allow the DSA to apply sanctions in a more proportionate and targeted way, further aligning it with the Hampton and Macrory principles.

Publication of an enforcement policy covering the DSA's powers in relation to the register of ADIs, as well as its policies regarding fraudulent driving instructors would also help to bring the DSA more in line with the Hampton principles. The Review Team felt that it was essential for the DSA to operate in a more transparent way and believes that this would assist in raising the standards of ADIs. By providing consumers with more information regarding its assessment of an ADI's competence (provided that this was founded on a robust and consistent assessment process), the DSA would encourage ADIs to raise their standards so as to succeed in a competitive market.

FOCUS ON OUTCOMES	
<i>Hampton principle</i>	
<i>“Regulators should measure outcomes and not just outputs.”</i>	
Key findings on Focus on Outcomes:	There is evidence that the DSA is effective in communicating its desired outcomes in relation to customer service. However, it is less clear that the DSA has a shared understanding of the regulatory outcomes that it aspires to. The DSA’s regulatory objectives are not clearly communicated to stakeholders.
Background information such as the regulator’s key objectives:	<p>The DSA’s stated mission is to “contribute to the public service agreement objective to achieve a 40% reduction in riders and drivers killed or seriously injured in road accidents, in the age group up to 24 years, by 2010 compared with the average for 1994-1998”. The DSA measures its performance against four tiers of targets:</p> <ul style="list-style-type: none"> - Secretary of State targets (Ministerial priorities); - Customer Promises (part of the Customer Excellence framework); - Service Standards (services for customers); and - Business Targets (efficiency measures). <p>The DSA has a predominantly customer-focused approach to its work and this is reflected in its desired outcomes and targets. The DSA’s regulatory functions in relation to driving instructors do not feature heavily in either its objectives or targets and it is unclear what regulatory outcomes the DSA aspires to.</p>
Example(s) of good practice:	The DSA has for some time implemented comprehensive plans for putting ADI competence assurance on a robust, modern professional footing, using techniques such as reflective practice in continuous professional development.
The extent to which the review team believes the regulator is acting in line with the Hampton	<p>A number of stakeholders stated that they were aware of the DSA’s objectives. The DSA’s vision of “safer driving for life” also appears to be well established, both within the DSA and amongst its stakeholders.</p> <p>Discussions with senior staff demonstrated that the DSA does have a vision of the regulatory outcomes that it aspires to. However, the Review Team felt that more could be done to effectively disseminate this vision through the</p>

principle:	organisation and communicate it to stakeholders.
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**Appendix 1:
Review team
membership**

Sydney Nash is an Assistant Director in the Better Regulation Executive in the Department for Business, Innovation and Skills. His background is in European regulatory policy and local authority regulatory enforcement.

Max Walker is the Health and Safety Executive's Head of Operations in the South West. He managed the HSE response to the Hampton Report and was seconded to the Better Regulation Executive team that reviewed the health and safety regulatory regime in 2007/2008.

Andrew Coulson is a Superintending Inspector in the Animals (Scientific Procedures) Inspectorate of the Home Office. His background includes extensive work in the private sector, including introduction of and ensuring compliance with various codes of good operating practice. He currently leads on risk assessment for the work of the Inspectorate.

Better Regulation Executive
Department for Business, Innovation and Skills
3rd Floor
1 Victoria Street
London SW1H 0ET

Website: www.bis.gov.uk

URN: 10/687

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